

231. Defendants deny the allegations contained in paragraph 231 of the Complaint.

**Gucci's First Claim for Relief  
Trademark Infringement**

232. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55 and 92 through 101 of this Answer as if fully set forth herein.

233. Defendants deny the allegations contained in paragraph 233 of the Complaint.

234. Defendants deny the allegations contained in paragraph 234 of the Complaint.

235. Defendants deny the allegations contained in paragraph 235 of the Complaint.

236. Defendants deny the allegations contained in paragraph 236 of the Complaint.

237. Defendants deny the allegations contained in paragraph 237 of the Complaint.

238. Defendants deny the allegations contained in paragraph 238 of the Complaint.

**Gucci's Second Claim for Relief  
Trademark Infringement**

239. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 232 through 238 of this Answer as if fully set forth herein.

240. Defendants deny the allegations contained in paragraph 240 of the Complaint.

241. Defendants deny the allegations contained in paragraph 241 of the Complaint.

242. Defendants deny the allegations contained in paragraph 242 of the Complaint.

243. Defendants deny the allegations contained in paragraph 243 of the Complaint.

244. Defendants deny the allegations contained in paragraph 244 of the Complaint.

245. Defendants deny the allegations contained in paragraph 245 of the Complaint.

**Gucci's Third Claim for Relief  
False Designation of Origin**

246. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 232 through 245 of this Answer as if fully set forth herein.



247. Defendants deny the allegations contained in paragraph 247 of the Complaint.

248. Defendants deny the allegations contained in paragraph 248 of the Complaint.

250. Defendants deny the allegations contained in paragraph 250 of the Complaint.

**Gucci's Fourth Claim for Relief  
False Designation of Origin**

251. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 232 through 250 of this Answer as if fully set forth herein.

252. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 252 of the Complaint.

253. Defendants deny the allegations contained in paragraph 253 of the Complaint.

254. Defendants deny the allegations contained in paragraph 254 of the Complaint.

255. Defendants deny the allegations contained in paragraph 255 of the Complaint.

256. Defendants deny the allegations contained in paragraph 256 of the Complaint.



257. Defendants deny the allegations contained in paragraph 257 of the Complaint.

**Gucci's Fifth Claim for Relief  
False Advertising**

258. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 232 through 257 of this Answer as if fully set forth herein.

259. Defendants deny the allegations contained in paragraph 259 of the Complaint.

260. Defendants deny the allegations contained in paragraph 260 of the Complaint.

261. Defendants deny the allegations contained in paragraph 261 of the Complaint.

262. Defendants deny the allegations contained in paragraph 262 of the Complaint.

**Gucci's Sixth Claim for Relief  
Trademark Dilution**

263. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 232 through 262 of this Answer as if fully set forth herein.

264. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 264 of the Complaint.

265. Defendants deny the allegations contained in paragraph 265 of the Complaint.

266. Defendants deny the allegations contained in paragraph 266 of the Complaint.

267. Defendants deny the allegations contained in paragraph 267 of the Complaint.

268. Defendants deny the allegations contained in paragraph 268 of the Complaint.

269. Defendants deny the allegations contained in paragraph 269 of the Complaint.

270. Defendants deny the allegations contained in paragraph 270 of the Complaint.

**Gucci's Seventh Claim for Relief  
Copyright Infringement**

271. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 232 through 270 of this Answer as if fully set forth herein.

272. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 272 of the Complaint.

273. Defendants deny the allegations contained in paragraph 205 of the Complaint.

274. Defendants admit the allegations contained in paragraph 274 of the Complaint.

275. Defendants deny the allegations contained in paragraph 275 of the Complaint.

277. Defendants deny the allegations contained in paragraph 277 of the Complaint.

278. Defendants deny the allegations contained in paragraph 278 of the Complaint.

**Gucci's Eighth Claim for Relief  
Common Law Trademark Infringement**

279. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 232 through 278 of this Answer as if fully set forth herein.

280. Defendants deny the allegations contained in paragraph 280 of the Complaint.

281. Defendants deny the allegations contained in paragraph 281 of the Complaint.

**Gucci's Ninth Claim for Relief  
Common Law Unfair Competition**

282. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 232 through 281 of this Answer as if fully set forth herein.



283. Defendants deny the allegations contained in paragraph 283 of the Complaint.

284. Defendants deny the allegations contained in paragraph 284 of the Complaint.

**Gucci's Tenth Claim for Relief  
New York General Business Law §349**

285. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 232 through 284 of this Answer as if fully set forth herein.

286. Defendants deny the allegations contained in paragraph 286 of the Complaint.

287. Defendants deny the allegations contained in paragraph 287 of the Complaint.

288. Defendants deny the allegations contained in paragraph 288 of the Complaint.

289. Defendants deny the allegations contained in paragraph 289 of the Complaint.

**Gucci's Eleventh Claim for Relief  
New York General Business Law §360-1**

290. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 232 through 289 of this Answer as if fully set forth herein.

291. Defendants deny the allegations contained in paragraph 291 of the Complaint.

292. Defendants deny the allegations contained in paragraph 292 of the Complaint.

293. Defendants deny the allegations contained in paragraph 293 of the Complaint.

**Bulgari's First Claim for Relief  
Trademark Infringement**

294. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13 and 72 through 101 of this Answer as if fully set forth herein.

295. Defendants deny the allegations contained in paragraph 295 of the Complaint.

296. Defendants deny the allegations contained in paragraph 296 of the Complaint.

297. Defendants deny the allegations contained in paragraph 297 of the Complaint.

298. Defendants deny the allegations contained in paragraph 298 of the Complaint.

299. Defendants deny the allegations contained in paragraph 299 of the Complaint.

300. Defendants deny the allegations contained in paragraph 300 of the Complaint.



**Bulgari's Second Claim for Relief  
Trademark Infringement**

301. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 72 through 101 and 294 through 300 of this Answer as if fully set forth herein.

302. Defendants deny the allegations contained in paragraph 302 of the Complaint.

303. Defendants deny the allegations contained in paragraph 303 of the Complaint.

304. Defendants deny the allegations contained in paragraph 304 of the Complaint.

305. Defendants deny the allegations contained in paragraph 305 of the Complaint.

306. Defendants deny the allegations contained in paragraph 306 of the Complaint.

307. Defendants deny the allegations contained in paragraph 307 of the Complaint.

**Bulgari's Third Claim for Relief  
False Designation of Origin**

308. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 72 through 101 and 294 through 307 of this Answer as if fully set forth herein.